

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

2009 DEC 16 4 9 21  
ATTACHMENT 1

**Tiffany Gouch**

**CIVIL ACTION**

**v.**

**NO.** 0912139  
100  
100

**The Recording Industry Association of America**

**COMPLAINT**

**Parties**

1. The Plaintiff, Tiffany Gouch, is a resident of Boston, Suffolk County, Massachusetts and a citizen of the United States.
2. The Defendant, The Recording Industry Association of America (RIAA), is based in Washington, D.C. in the United States.

**Jurisdiction**

This court has jurisdiction over this matter pursuant to 17 U.S.C.

**Facts**

3. The Recording Industry Association of America (RIAA) is a trade group that represents the United States Recording Industry, which consists of over 1,600 record labels and distributors headed by "The Big Four": EMI, Sony Entertainment, Warner Music Group, and Universal Music Group.

4. Tiffany Gouch is an artist that written personal journals entries of her most intimate thoughts and feelings, intermittently, since she was a teenager.
5. The plaintiff did not intend to share her journal entries with anyone, but rather used it as a form of catharsis during a difficult time in her life.
6. In 2005, Tiffany Gouch ended a long term relationship with her girlfriend and began journaling her feelings about that relationship and others.
7. In 2006 the plaintiff began auditioning as “singer/songwriter” talent for music based reality shows.
8. In 2006 the plaintiff’s journal became missing.
9. Between the years 2007 and 2008 “The Big Four” have collectively sold over 27 million albums certified by the RIAA which derived from journal entries written by Tiffany Gouch. These songs include:

“No One” by Alicia Keys

“Womanizer” by Britney Spears

“If I Were A Boy” by Beyonce

“Single Ladies” by Beyonce

“Whatever You Like” by T.I.

“Just Like Me” by Jamie Foxx

“Mrs. Officer” by Lil’ Wayne

*The Real Thing*, Album by Jill Scott

“I Kissed A Girl” by Katy Perry

“Hot N’ Cold” by Katy Perry

“Take A Bow” by Rihanna

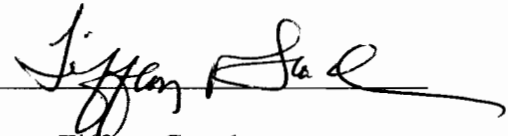
“No Air” by Chris Brown/Jordin Sparks

“Touch My Body” by Mariah Carey

10. The RIAA, including “The Big Four”, it’s artists, employees, and associated firms have violated the plaintiff’s right to copy by copying, creating derivative works, distributing, publicly performing, and publicly displaying the plaintiff’s personal journal entries throughout the world more than several billion times.

11. The plaintiff registered her copyright for the journal entries in May of 2009.

**WHEREFORE** the plaintiff, Tiffany Gouch seeks judgment against the defendant for damages in the amount of 1.43 billion U.S. dollars (\$1,430,000,000), as well as to be added to the copyright as songwriter of these songs from now into the future, as well as any other public acknowledgement as writer of these songs and/or to be awarded any additional judgment as the court deems fair.

Signature   
Tiffany Gouch  
67 Newbury Street  
Boston, MA 02116  
(617) 267- 1722